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PRELUDE FERTILITY, INC  
12

13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15

16 IN RE PACIFIC FERTILITY CENTER  
LITIGATION  
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Case No. 3:18-cv-01586-JSC

**STIPULATION AND  
[PROPOSED] ORDER TO  
CONTINUE DEADLINE FOR  
FILING ESI PROTOCOL AND  
PROPOSED PROTECTIVE  
ORDER**

1 Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, Plaintiffs, Pacific Fertility Clinic  
2 (“PFC”), Prelude Fertility, Inc (“Prelude”), and Chart Industries, Inc. (“Chart”), by and through  
3 their respective counsel, respectfully submit this stipulation and Proposed Order to continue from  
4 August 31, 2018 to September 7, 2018, the deadline for filing the parties’ Electronically Stored  
5 Information (“ESI”) Protocol and Proposed Protective Order.

6 WHEREAS, on August 23, 2018, the parties attended the Case Management Conference  
7 in this action before Judge Corley (ECF No. 87). At the hearing, the parties represented to the  
8 Court that they would file their joint ESI Protocol and Proposed Protective Order by August 31,  
9 2018 (Declaration of William F. Tarantino ¶ 2).

10 WHEREAS, the parties have met and conferred on proposed drafts of the ESI Protocol  
11 and the Proposed Protective Order (*id.* ¶ 3). The parties believe that they will be able to reach an  
12 agreement on the ESI Protocol and Proposed Protective Order but that additional time is needed  
13 to do so (*id.*).

14 WHEREAS, the parties have agreed that the deadline to file the ESI Protocol and  
15 Proposed Protective Order should be continued until September 7, 2018 (*id.* ¶ 4).

16 NOW THEREFORE, the parties stipulate and respectfully request that the Court issue an  
17 Order as follows:

18 The deadline for filing the parties’ ESI Protocol and Proposed Protective Order is hereby  
19 continued until September 7, 2018.

20 **IT IS SO STIPULATED.**

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1 Dated: August 31, 2018

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5 By: /s/ Erin M. Bosman  
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PRELUDE FERTILITY, INC

8 Dated: August 31, 2018

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11 Dated: August 31, 2018

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**~~PROPOSED~~ ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: September 4, 2018

  
HONORABLE JACQUELINE SCOTT CORLEY  
UNITED STATES MAGISTRATE JUDGE

**FILER'S ATTESTATION**

Pursuant to Civil L.R. 5-1(i)(3), regarding signatures, I, Erin M. Bosman attest that concurrence in the filing of this document has been obtained.

Dated: August 31, 2018

/s/ Erin M. Bosman  
Erin M. Bosman